

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
)
MARIA D. PONCE,) NO.: 16-40877-TAB
)
Debtor.) CHAPTER 13
)
) JUDGE: TIMOTHY A. BARNES
)

**NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19
PANDEMIC**

Now comes PennyMac Loan Services, LLC (“Creditor”), by and through undersigned counsel, and hereby submits Notice Forbearance Agreement to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of three (3) months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting November 1, 2020 through January 1, 2021. Debtor has requested to extend their forbearance period to include the mortgage payments May 1, 2021 through July 1, 2021.

Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable nonbankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Debtor will resume mortgage payments beginning August 1, 2021 and will be required to cure the delinquency created by the forbearance period (“forbearance arrears”).

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

In the event it is not the intent of the Debtor to extend the COVID-19 forbearance period, upon receipt of notification from the Debtor or Debtor's counsel, the forbearance extension will be cancelled, and this notice will be withdrawn.

Respectfully submitted,

/s/Dana O'Brien

Dana N. O'Brien, IL Bar No. 6256415

Attorney for Creditor

McCalla Raymer Leibert Pierce, LLC

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Roswell, GA 30076

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CERTIFICATE OF SERVICE

TO: SEE ATTACHED ADDRESSES

CERTIFICATION

I, the undersigned Attorney, Certify that I served a copy of this Order to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 N. Dearborn Suite 1200, Chicago, IL 60602 at 5:00 P.M. on May 27, 2021, with proper postage prepaid.

McCalla Raymer Leibert Pierce,
LLC

/s/Dana O'Brien

ARDC# 6256415

1 N. Dearborn Suite 1200

Chicago, IL 60602

(312) 346-9088

File No. PMHL-19-00502-2

SERVICE LIST

To Trustee:
Marilyn O. Marshall
224 South Michigan
Suite 800
Chicago, IL 60604

by Electronic Notice through ECF

To Debtor:
Maria D. Ponce
3624 W 56th St
Chicago, IL 60629

Served via U.S. Mail

To Attorney:
Joseph S Davidson
Law Offices of Joseph P. Doyle, LLC
105 S. Roselle Rd.
Schaumburg, IL 60193

by Electronic Notice through ECF

McCalla Raymer Leibert Pierce, LLC
Attorney For: Creditor
1 N. Dearborn Suite 1200
Chicago, IL 60602
(312) 346-9088